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Attorney for Defendants
Bank of America, N.A. and
Bank of America Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

CITY OF OAKLAND, CALIFORNIA,

Plaintiff,

v.

AIG FINANCIAL PRODUCTS CORP., *et al.*,

Defendants.

Case No. CV-08-2116-MMC

**STIPULATION AND ORDER
EXTENDING TIME TO ANSWER OR
OTHERWISE RESPOND TO
COMPLAINT**

WHEREAS the above-referenced action is the subject of on-going proceedings before the
United States Judicial Panel on Multidistrict Litigation in the *In re Municipal Derivatives
Antitrust Litigation*, MDL No. 1950, matter;

1 WHEREAS Defendants Bank of America, N.A. and Bank of America Corporation
2 (collectively "Bank of America") have sought the consent of City of Oakland, California
3 ("Oakland") for an extension of time to file an answer or otherwise respond to the Class Action
4 Complaint in the above-referenced action;

5 WHEREAS Bank of America has offered to produce and/or provide documents to
6 Oakland on the same terms and subject to the same conditions as plaintiffs in other related
7 litigation and that offer shall remain available to Oakland;

8 WHEREAS Bank of America has sought no other extensions in the above-referenced
9 action to date;

10 WHEREAS on May 27, 2008, the Court entered a Case Management Conference Order
11 setting a Case Management Conference for Friday, August 1, 2008 and the submission of a Case
12 Management Statement by July 25, 2008, and as such, it is possible that this Stipulation would
13 alter an event or deadline fixed by Court order;

14 WHEREAS Oakland has consented to an extension of time for Bank of America to
15 answer or otherwise respond to the Class Action Complaint in the above-referenced action;

16 WHEREAS Oakland agrees that submission of this Stipulation should be without
17 prejudice to Bank of America or any other defendant to this action;

18 THE PARTIES HEREBY STIPULATE that Defendants Bank of America, N.A. and Bank
19 of America Corporation are granted an extension of time to answer or otherwise respond to the
20 Class Action Complaint in the above-referenced action until the 60th day after the Judicial Panel
21 on Multidistrict Litigation has decided the centralization motion pending in docket No. 1950, In
22 re Municipal Derivatives Antitrust Litigation, and plaintiff has filed a consolidated amended
23 complaint (or has announced by filed notice that it will not be filing a consolidated amended
24 complaint), unless the transferee court orders otherwise; provided, however, that in the event
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1 Bank of America agrees to an earlier response date in any municipal derivatives case, Bank of
2 America shall respond to the City of Oakland's complaint on that earlier date.

3 IT IS SO STIPULATED:

4 KING & SPALDING LLP

LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP

6 By: Brenda N. Buonaiuto

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12 Counsel for Defendants
13 Bank of America, N.A.
14 Bank of America Corporation

Counsel for Plaintiff
City of Oakland

14 Dated: June 2, 2008

Dated: June 2, 2008

15 PURSUANT TO STIPULATION, IT IS SO ORDERED this 5th day of June, 2008.

17 Maxine M. Chesney
18 Hon. Maxine M. Chesney